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MEMORANDUM

TO: Nancy Dean, RPM Federal Facilities, EPA Region IV
FROM: John A. Lindsay, Coastal Resource Coordinator 
DATE: December 4, 1990
SUBJECT: Naval Air Station - Jacksonville
RE: Preliminary Draft Specific RI/FS Work Plan for PSC No.26 and No.27

The preliminary draft specific work plan for the Pits site is vague about what "constituents of concern" they are planning to analyze for. The additional water quality analyses performed in 1984 showed high concentrations of compounds that were not analyzed for previously. The limited sampling proposed for Phase I should rely on full scan measurements to ensure that as many potentially toxic substances as possible can be identified.

Care should be taken in placing the background samples north of the Pits site, because before the ditches were constructed, the groundwater appeared to be moving out in all directions from the site. As a result, areas that are now upgradient may have been contaminated by past releases. Also, there have been industrial storm sewers leaking solvent and spills at many locations at the Air Station.

At least a minimal effort is recommended to survey the extent and types of contamination that may reside in the drainage ways that were used during the period when the ditches operating as a leachate collection and treatment system. Persistent trace elements and/or organic compounds could have accumulated in the sediments and may still pose a threat to exposed organisms.

Finally, the approach of breaking down the NAS Jacksonville site into pieces for the RI/FS program may not address overall problems at NAS Jacksonville. Overall resource protection would be better served by evaluating all potential contaminant sources concurrently.

